FINAL REMOVAL ASSESSMENT REPORT

SITE NAME: Wildroot Building Site
DC No.: RST3-01-F-0037
TDD No.: TO-0001-0018
EPA SSID.: A23X
SAMPLING DATE: August 4 through 13, 2014

1. Site Location: 1740 Bailey Avenue
Buffalo, Erie County, New York
(Refer to Attachment A, Figure 1 - Site Location Map)

2. Sample Collection Summary:

On August 6, 2014, 11 waste samples were collected from drums and containers found at the Wildroot Building Site (the Site). The waste samples were collected from abandoned drums and containers inside and outside the on-site building. Nine of the samples were liquid waste and the remaining two were solid waste. Ten of the 11 samples were submitted for target compound list (TCL) volatile organic compound (VOC), TCL semivolatile organic compound (SVOC), TCL pesticide (Pest), TCL polychlorinated biphenyl (PCB), target analyte list (TAL) metal, including mercury, and Resource Conservation and Recovery Act (RCRA) characteristics analyses. One liquid waste sample was submitted for RCRA characteristics analysis only due to the small volume of material present within the container. Two liquid samples were composite samples, each composed of liquids from three different drums. Seven bulk samples were collected from building insulation found on the ground around the building for asbestos analysis. On August 7, 2014, 27 bulk samples collected from various building materials, three dust samples, six soil samples, including one field duplicate, and one liquid waste sample were collected. The bulk and dust samples were submitted for asbestos analysis and the soil samples were submitted for TCL VOC, SVOC, PCB, TAL metal, including mercury, and asbestos analyses. The liquid waste sample, which was collected from an abandoned underground storage tank (UST), was submitted for TCL VOC, SVOC, Pest/PCB, TAL metals, including mercury, and RCRA characteristics analyses. On August 8, 2014, 12 paint chip samples were collected from inside the on-site building. The paint chip samples were submitted for total lead analysis.

Attachment A, **Figure 2**: Site Overview, provides an overview of the investigation area as well as locations of the UST ports; **Figure 3**: Drum/Container Sampling – First Floor Main Building and East Wing, provides an overview of the locations of investigated drums and containers within the on-site building; **Figure 4**: First Floor/Ground Level Samples – Asbestos, Soils, and Paint Chips, identifies the locations of the asbestos, soil, and paint chip samples collected from the first floor of the on-site building and surrounding area; **Figure 5**: Second Floor Samples – Asbestos and Paint Chips, identifies the locations of the asbestos and paint chip samples collected from the second floor of the on-site building; **Figure 6**: Third Floor Samples – Asbestos and Paint Chips, identifies the locations of the asbestos and paint chip samples collected from the third floor of the on-site building.

Attachment B presents photographic documentation of the activities that occurred during the U.S. Environmental Protection Agency (EPA) Removal Assessment sampling event.

Please refer to the tables presented in Attachment C for a summary of samples collected by Weston Solutions, Inc., Removal Support Team 3 (RST 3) during the EPA Removal Assessment sampling event and the subsequent laboratory analytical results:

- Table 1: Sample Collection Information
- Table 2: Container/Drum Inventory and HazCat Data
- Table 3: Asbestos Sample Collection Information and Validated Analytical Results
- Table 4: Analytical Data Summary: Volatile Organic Compounds (VOCs)
- Table 5: Analytical Data Summary: Semivolatile Organic Compounds (SVOCs)
- Table 6: Validated Analytical Data Summary: Pesticides
- Table 7: Analytical Data Summary: Polychlorinated Biphenyls (PCBs)
- Table 8: Analytical Data Summary: RCRA Characteristics
- Table 9: Analytical Data Summary: TAL Metals and Mercury
- Table 10: Validated Analytical Data Summary: Total Lead (Paint Chips)

3. Laboratories Receiving Samples:

The following laboratories were utilized during the August 2014 sampling event:

Laboratory Name/Location	Sample Matrix	Analysis
CompuChem 501 Madison Ave. Cary, NC 27513	Solid waste and Liquid waste	TCL VOC, SVOC, Pesticides, PCBs, TAL Metals, including Hg, RCRA Characteristics
	Soil	TCL VOC, SVOC, PCB, TAL Metals, including Hg
	Paint Chips	Total Lead
Batta Laboratories 6 Garfield Way Newark, DE 19713	Soil, Dust, Bulk	Asbestos

4. Sample Dispatch Summary:

On August 6, 2014, nine liquid waste and two solid waste samples were shipped under Chain of Custody (COC) Record Numbers (Nos.) 2-080614-124106-0001, 2-080614-125105-0002, 2-080614-130807-0003, and 2-080614-131105-0004 via FedEx Airbill Nos. 5029-7820-8623 and 5029-7820-8656 to Compuchem located in Cary, North Carolina. The samples were submitted for TCL VOC, SVOC, Pest/PCB, TAL metals and mercury, and RCRA characteristics analyses.

On August 7, 2014, six soil samples, including one field duplicate, and one liquid waste sample were shipped under COC Record No. 2-080714-151350-0005, via FedEx Airbill No. 7707-8581-7446 to Compuchem located in Cary, North Carolina. The liquid waste sample was submitted for TCL VOC, SVOC, Pest/PCB, TAL metals and mercury, and RCRA characteristics analyses. Five of the soil samples were submitted for TCL VOC, SVOC, PCB, and TAL metals and mercury analyses. One soil sample (P001-S004-0002-01) was collected inside the building and was submitted for TCL SVOC and PCB analyses only due to the small sample volume.

On August 9, 2014, 12 paint chip samples were shipped under COC Record No. 2-080914-110721-

0007 via FedEx Airbill No. 7707-9913-3976 to Compuchem located in Cary, North Carolina. The samples were submitted for total lead analysis.

On August 9, 2014, 34 bulk, three dust, and five soil samples were shipped under COC Record No. 2-080914-105504-0006 via FedEx Airbill No. 7707-9913-0348 to Batta Laboratories located in Newark, Delaware. The samples were submitted for asbestos analysis.

Please refer to Attachment E for the COC Records and FedEx Airbills.

5. On-Site Personnel:

Name	Representing	Duties On-Site
Mark Bellis	U.S. EPA, Region II	On-Scene Coordinator
David Rosoff	U.S. EPA, Region II	On-Scene Coordinator
Joel Siegel	RST 3, Region II	Site Project Manager, Site H&S, Site QA/QC, Sample Collection, and Sample Management
Peter Lisichenko	RST 3, Region II	Sample Collection and Sample Management
Catherine DeSarle	RST 3, Region II	Sample Collection and Sample Management
Jeffrey Schulz	RST 3, Region II	Sample Collection and Sample Management

6. Site Background and Description:

The Site is comprised of an approximately 100,000 square foot building located at 1740 Bailey Avenue, Buffalo, New York in an area that includes both industrial and residential use. The property was the location of a manufacturer of personal care products (hair tonics and dressings), and prior to that, a bakery. The property has had other light industrial activities (warehousing/manufacture of plastic components) in the past, but has lain fallow for many years and has come into substantial disrepair. The Site shows evidence of structural integrity issues including holes in the roof and brick façade failure.

The Site is bordered by Fay Street to the west, West Shore Avenue to the south, Bailey Avenue to the east and Scheu Park to the north. Bailey Avenue has a raised bridge adjacent to the building. A railroad switching yard is located directly south of West Shore Avenue. The building is a three-story concrete and brick building in an advanced state of disrepair with missing windows and a collapsing roof. Several mixed use industrial buildings and an automotive/truck recycling yard are located within 1,000 feet of the Site. Also in close proximity are 20 residences within 600 feet of the Site and an elementary school approximately 1,200 feet from the Site.

7. Investigation Objectives:

The objective of the EPA Removal Assessment was to conduct multi-media sampling, including liquid and solid waste, soil, paint chips, and presumed asbestos containing material (PACM) and field characterization testing to determine the presence of hazardous substances at the Site. The contents of the drums, containers and tanks were characterized to determine whether the Site posed a potential threat to human health and/or the environment. The analytical data from this investigation will be used to assist the EPA in determining whether a Removal Action at the Site is warranted to remove any hazardous substances present.

8. Sample Collection Methodology:

Waste Samples:

Container sampling activities were conducted in accordance with guidelines outlined in EPA/Environmental Response Team (ERT) Drum Sampling Standard Operating Procedure (SOP) No. 2009. Tank sampling of the one UST was conducted in accordance with guidelines outlined in EPA/ERT Tank Sampling SOP No. 2010. The container liquid waste was sampled using dedicated, disposable coliwasas and drum thieves. The solid waste samples were collected as grab samples using dedicated, disposable plastic scoops. The tank liquid waste was sampled using dedicated poly bailers. Sample locations were determined by the EPA On-Scene Coordinator (OSC). Waste samples were screened on-site utilizing a HazCat® Chemical Identification kit (HazCat).

A total of 27 drums/containers of various sizes and one UST were identified and inventoried at the Site. Of the 27 drums/containers, one was empty and three did not contain enough material to collect for HazCat testing. A total of 23 contained liquids of various physical and chemical compositions and four contained solid materials that were characterized as either tar-like, grease, or a white gel. Five drums contained liquids that separated into two phases. A UST of indeterminate size was identified and found to contain liquid. HazCat testing was performed on liquid from sixteen 55-gallon drums, one 15-gallon container, two 5-gallon containers, and one UST. HazCat testing was performed on solid materials from one 5-gallon container and three 55-gallon drums. Evidence of three additional USTs believed to be former heating oil tanks was observed, but they appeared to be filled in with brick and soil. Refer to Attachment A, Figures 2 and 3 for the locations of the USTs and the locations of the drums/containers, and Attachment C, Table 2, Container/Drum Inventory and HazCat data.

A total of 29 waste samples were analyzed on-site using the HazCat kit. These included five analyses of dual-phase liquids found in the containers. Based on results obtained from the HazCat field screening and at the request of the EPA OSC, 12 waste samples, including 10 liquid waste and two solid waste samples, were submitted for laboratory analyses. A total of 11 of the samples were submitted for TCL VOC, SVOC, Pest/PCB, TAL metals, including mercury, and RCRA characteristics analyses. Two of the samples (P001-COMP01-LW-01 and P001-COMP02-LW-01) were composite samples which were composed of materials from three drums each. One sample was submitted for RCRA characteristics analysis only due to the small volume of liquid in the drum. Refer to Attachment C, Table 1 for the sample collection information, Table 2 for the Container/Drum Inventory and HazCat data, and Tables 4 through 9 for the analytical results; Attachment B for the photographic documentation; and Attachment D for the Field Testing Logs.

Soil Samples:

Soil sampling was conducted in accordance with guidelines outlined in EPA/ERT Soil Sampling SOP No. 2012. Four outdoor soil samples, including one field duplicate, were collected from 0 to 2 inches below ground surface (bgs). Two soil samples were collected from inside the building. One sample was collected from a boiler cleanout, and the other sample was collected from a chimney cleanout. Sample locations were determined by the EPA OSC and were biased towards locations with staining, proximity to former above ground storage tanks (ASTs), or the presence of PACM around the perimeter of the on-site building. A total of six soil samples, including one field duplicate, were collected from the Site for laboratory analyses. Three EnCore samplers were used to collect each sample where TCL VOC analysis was required. Thereafter, samples for TCL SVOC, TCL PCB, TAL metals, including mercury, and asbestos analyses were collected using dedicated disposable plastic scoops, homogenized in aluminum pie tins, and placed into laboratory glassware.

The interior soil sample (P001-S004-0002-01) was analyzed for TCL SVOCs and PCBs only due to the small amount of material available for sampling. Refer to Attachment A, Figure 4, First Floor/Ground Level Samples, Asbestos, Soils and Paint Chips, and Attachment C, Table 1 for the sample collection information and Tables 3, 4, 5, 7, and 9 for the analytical results.

Paint chip Samples:

Paint chip samples were collected for total lead analysis. Paint chips were collected with the use of disposable paint scrapers. Paint from the interior walls was scraped onto a disposable aluminum sheet and the chips then placed into laboratory glassware. Paint chips were collected from locations on the first, second, and third floor of the on-site building. A total of 12 paint chip samples were collected for analysis. Refer to Attachment A, Figures 4, 5, and 6 for the paint chip sample locations, Attachment C, Table 1, Sample Collection Information, and Attachment C, Table 10, Validated Analytical Data Summary: Total Lead (Paint Chips).

Bulk and Dust Samples:

Bulk and dust samples were collected for asbestos analysis. Bulk samples were collected from PACM located throughout the Site. These materials included pipe wrap, insulation, plaster, mastic, and other miscellaneous building materials. A total of 34 bulk samples were collected. Eight of the bulk samples were collected from outside of the building from PACM that appeared to have originated inside the building but had fallen or been tossed out of the open or paneless windows. Three dust samples were collected from inside the building from areas where white dust or degraded building materials had collected. The samples were placed into polyethylene bags after collection. Sample locations were determined by the EPA OSC. Refer to Attachment A, Figures 4, 5, and 6 for the bulk and dust sample locations, Attachment B for photographic documentation, Attachment C, Table 1, Sample Collection Information, and Table 2, Asbestos Sample Collection Information and Validated Analytical Results.

On August 13, 2014, an inventory of the total PACM identified in the on-site building was conducted by RST 3. Refer to Attachment F for the table of estimated material.

Report prepared by: _____ 10/23/2014
Joel Siegel — Date
RST 3 Site Project Manager

Report reviewed by: _____ 10/23/2014
Timothy Benton — Date
RST 3 Operations Leader

ATTACHMENT A

Figure 1: Site Location Map
Figure 2: Site Overview
Figure 3: Drum/Container Sampling – First Floor Main Building and East Wing
Figure 4: First Floor/Ground Level Samples – Asbestos, Soils, and Paint Chips
Figure 5: Second Floor Samples – Asbestos and Paint Chips
Figure 6: Third Floor Samples – Asbestos and Paint Chips

ATTACHMENT B

Photographic Documentation

ATTACHMENT C

ATTACHMENT D

Drum Inventory & Field Testing Logs

ATTACHMENT E

Chain of Custody Records and FedEx Airbills

ATTACHMENT F

Potential Asbestos Containing Material Inventory